

Marie-Ann Greenberg, MAG-1284
Marie-Ann Greenberg, Standing Trustee
30 TWO BRIDGES ROAD
SUITE 330
FAIRFIELD, NJ 07004-1550
973-227-2840
Chapter 13 Standing Trustee

IN RE:
GRACE LIANG

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Case No.: 18-33410SLM

HEARING DATE: 09/25/2019 at 10:00 a.m.

TRUSTEE'S OBJECTION TO MOTION FOR PAYMENT OF UNCLAIMED FUNDS

Marie-Ann Greenberg, the Chapter 13 Standing Trustee by way of objection to motion for payment of unclaimed funds, respectfully objects as follows:

- The instant motion fails to comply with D.N.J LBR 3011-1(b), as only the original payee or its legal successor may bring a Motion for Unclaimed Funds. The funds in question represent debtor's refund after dismissal of the case. As a result, only debtor may bring a motion to release unclaimed funds. The movant appears to be a creditor in this case, and as a result, is not authorized to file this motion. Further, since this case was dismissed prior to confirmation, 11 USC 1326(a)(2) requires accumulated plan payments to be returned to debtor. Based upon the foregoing, this Motion should be denied.

It is for these reasons that the motion for payment of unclaimed funds should be denied.

Dated: August 30, 2019

By: /S/Marie-Ann Greenberg
Marie-Ann Greenberg, Esquire
Chapter 13 Standing Trustee